

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

SHELDON G. ADELSON,

Plaintiff,

v.

MOSHE HANANEL,

Defendant.

**Civil Action No. 04-cv-10357-RCL  
(Sorokin, U.S.M.J.)**

**ECF Case**

**PLAINTIFF'S STATEMENT OF UNCONTESTED FACTS**

Facts relating to the Statute of Frauds:

1. Defendant Moshe Hananel claims a contractual entitlement to compensation in the form of an interest in one or more investments made by Plaintiff Sheldon G. Adelson or entities with which Adelson is affiliated. See Answer ¶ 26.

2. Hananel claims that the alleged contract entitled him to compensation for finding business opportunities for Adelson or entities with which Adelson is affiliated. See Answer ¶¶ 21-24.

3. The alleged contract was not in writing. See Dkt. #31, Ex. 1 ¶ 7.

Facts relating to causation:

4. Hananel was given a notice of termination from Interface Partners International, Ltd. in April 2000. Schapiro Decl. filed herewith, Ex. B (Adelson Aff.) ¶ 63.

5. The Macau Tender Commission was established on October 31, 2001. Schapiro Decl. (filed herewith), Ex. C (Oliveira Aff.) ¶ 14.

6. The Macau Tender Commission actively solicited bids for casino concessions from foreign casino operators, including Las Vegas Sands. Schapiro Decl. (filed herewith), Ex. C (Oliveira Aff.) ¶¶ 8-12.

July 30, 2008

Respectfully submitted,

/s/ Andrew H. Schapiro

MAYER BROWN LLP

Andrew H. Schapiro

Christopher J. Houpt

1675 Broadway

New York, New York 10019

(212) 506-2500

*Attorneys for Plaintiff*

*Sheldon G. Adelson*

**Certificate of Service**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Andrew H. Schapiro